



April 15, 2015

Ms. Elizabeth Butler  
USEPA - Region II  
Emergency and Remedial Response Division  
290 Broadway, 19<sup>th</sup> Floor  
New York, NY 10007

Re: Transmittal – Comment/Response and Final SCSR  
Riverside Industrial Park Superfund Site  
Newark, New Jersey

Dear Ms. Butler:

On behalf of PPG Industries, Woodard & Curran, herein provides responses to U.S. Environmental Protection Agency (USEPA) comments and responses to comments of March 25, 2015, regarding the January 2015 Revised Site Characterization Summary Report (SCSR) for the above-referenced site.

**NOTES ON PREVIOUS RESPONSES TO COMMENTS:**

**NOTE 1: GENERAL COMMENT NO. 3: RAGS Part D Tables Planning Worksheets Data Usability will need to be completed in the Risk Assessment document.**

**RESPONSE:** Risk Assessment Guidance for Superfund (RAGS) Part D Tables Planning Worksheets Data Usability will be completed and included in the Baseline Human Health Risk Assessment. The Remedial Investigation/Feasibility Study(RI/FS) Work Plan will present the components of the risk assessment document including these tables.

**NOTE 2: GENERAL COMMENT NO. 4: The development of toxicity values will need to be submitted to EPA so that they can be sent to the Superfund Technical Support Center for review and approval of use in the risk assessment.**

**RESPONSE:** The RI/FS Work Plan sections pertaining to the risk assessment will address chemicals lacking toxicity information. At a minimum, the Uncertainty Analysis Baseline Human Health Risk Assessment (BHHRA), will present "developed" toxicity values used. The RI/FS Work Plan will have an alternative process for submitting toxicity values developed to USEPA for review and approval prior to the BHHRA submittal.

**NOTE 3: GENERAL COMMENT NO. 6: According to the Chief Urban Designer at the City of Newark, Riverfront Zoning 2013 calls for the majority of the Site to be dedicated industrial. The one possible exception is the Chester Avenue access. The community has expressed an interest in a walking path along the rail line adjacent to the western boundary of the Site and across an expanded easement to the river. These are preliminary thoughts at this point, so the City of Newark's input will continue to be needed.**



**RESPONSE:** Input from the City of Newark will continue to be requested and this process will be further described in the RI/FS Work Plan and Reuse Assessment Plan.

**NOTE 4: SPECIFIC COMMENT NO. 4:** The latest RSLs will be used in the screening and screening levels will be associated with a risk level of  $10^{-6}$  and an HI = 0.1.

**RESPONSE:** The latest residential screening levels will initially be utilized for the risk assessment and screening levels will be associated with a risk level of  $10^{-6}$  and a Hazard Index (HI) = 0.1. The screening process and associated risk levels will be in the RI/FS Work Plan.

#### **NEW EPA SPECIFIC COMMENTS (January 2015)**

**COMMENT NO. 1:** Section 1.1, p. 1-1 – Delete the following sentence “Focused” from “Information presented in the SCSR will be incorporated into the future Remedial Investigation Report after approval is received from U.S. Environmental Protection Agency (USEPA).”, and spell out USEPA in last sentence.

**RESPONSE:** Sentence was deleted and last sentence revised.

**COMMENT NO. 2:** Section 3.8.2, p 3-9 – EPA does not agree with the last couple of sentences in this section characterizing the quality of the data. To clarify, EPA previously stated in a June 17, 2014 email to PPG that EPA has reason to question analytical laboratory result data for samples taken at the Riverside Avenue Site. The email further stated that EPA is not able to say that these data are of known quality and the samples in question were provided by EPA to PPG in an attachment to the June 17, 2014 email. Also in that email, EPA requested that PPG not use the data in its SCSR for the Site. EPA’s position on this remains the same today as it did on June 17, 2014, therefore, please revise those last sentence as follows: “The results of the investigation were reviewed; however, USEPA requested that PPG not use this data in its Site Characterization Summary Report for the Site because USEPA is not able to say that these data are of known quality.” This clarification should be made in any other places in the document where the data from the June 17, 2014 email are discussed as well.

**RESPONSE:** Section 3.8.2 has been revised.

**COMMENT NO. 3:** Section 4.4, p. 4-4 – The first sentence of the second paragraph refers to Appendix G, but it seems like it should be Appendix F.

**RESPONSE:** Section 4.4 has been revised.

**COMMENT NO. 4:** Section 6.1.4, p. 6-3 – See the EPA POLREP #25, the final PolRep, for further information about the USEPA removal action that was completed in 2014 and update text accordingly.

**RESPONSE:** Additional information from the final PolRep has been added to Section 6.1.4, and POLREP #25 has been included in Appendix G.

**COMMENT NO. 5:** Section 6.1.5, p. 6-4 – Rewrite the 2<sup>nd</sup>, 3<sup>rd</sup>, and 4<sup>th</sup> paragraphs to state the facts about the recent results without the conclusory statements about PPG’s usage.

**RESPONSE:** The 2<sup>nd</sup>, 3<sup>rd</sup>, and 4<sup>th</sup> paragraphs have been revised and/or removed to extract conclusory statements about PPG's usage.



If these responses do not adequately address the USEPA's comments or you have questions regarding these responses, please contact Mr. Thomas Ebbert, Project Coordinator.

Enclosed are the revised cover and text portions of the report as requested, along with two electronic copies of the SCSR. This report is submitted in accordance with the Administrative Settlement Agreement and Order on Consent and accompanying Statement of Work.

Respectfully submitted,

WOODARD & CURRAN

A handwritten signature in dark ink, appearing to read "Ken J. Bird", is written over the printed name.

Kenneth J. Bird, LSRP  
Senior Vice President

KJB/jar  
Enclosures  
Project No. 0013620.10

pc: Mr. Thomas Ebbert – PPG Industries, Inc. (electronic copy)  
William J. Reilly, Esq. – USEPA, Region II (electronic copy w/o enclosure)  
Peter T. Stinson, Esq. – Dickie McCamey & Chilcote, P.C. (electronic copy)